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IGOR ALEKSEYEVICH DUTOV

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF CALIFORNIA

In re:

IGOR ALEKSEYEVICH DUTOV

Debtor.

) Case No.: 10-23054-C-7

) Chapter 7

) DCN: ADS - 01

) **MOTION FOR ORDER COMPELLING**
) **TRUSTEE TO ABANDON DEBTOR'S**
) **BUSINESS AS ASSET OF ESTATE [11**
) **USCS § 554(b), 721]**

) Date: March 16, 2010

) Time: 9:30 a.m.

) Courtroom: 35

Honorable Judge Christopher M. Klein

MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON DEBTORS'
BUSINESS AS AN ASSET OF THE ESTATE

Debtor IGOR ALEKSEYEVICH DUTOV, by and through his attorney of record Mark
Shmorgon, will and hereby does bring a Motion to Compel Trustee to Abandon The Estate's

1 Interest in Debtors' Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the
2 Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6007(b).

3 By this motion Debtor requests that the Court enter an order compelling the Chapter 7
4 Trustee to abandon the bankruptcy estate's interest in Debtor's business on the following grounds:

- 5 1. Debtor's business does not possess or own any assets that might be liquidated for
6 value to benefit creditors and is therefore of inconsequential benefit to the estate,
7 and;
- 8 2. The retention and operation of the business by the Trustee would be burdensome
9 and costly to the estate and the creditors thereof.

10 Said grounds will be supported by this notice of motion, by the motion filed herewith, by the
11 pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein,
12 declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and
13 documentary evidence as the Court may permit upon the hearing of this motion.

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15 ATTORNEY DEBT SOLUTIONS, PC

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17 Dated: 2/22/10

18 By: 

19 Mark Shmorgon
20 Attorney for Debtors
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